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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY	DEPUTY

ELIZABETH A. STRANGE  
First Assistant United States Attorney  
District of Arizona  
CHRISTINA M. VEJAR  
Assistant U.S. Attorney  
United States Courthouse  
405 W. Congress Street, Suite 4800  
Tucson, Arizona 85701  
Telephone: 520-620-7300  
Email: Christina.vejar@usdoj.doj  
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
  
Plaintiff,  
  
vs.  
  
Redacted Defendant #1, et al  
  
Defendants.

CR 18-01583-TUC-JGZ-BGM

GOVERNMENT'S MOTION TO  
UNSEAL CASE, FILE REDACTED  
INDICTMENTS, MAKE PUBLIC THE  
NAME OF DEFENDANTS #3, #4 and #6,  
AND MAINTAIN NAMES OF REDACTED  
DEFENDANTS UNDER SEAL

(Paper Filed In A Sealed Case; Certain  
Defendant Names to Remain Redacted)

The United States of America, by and through its undersigned attorneys, respectfully requests that in order to balance the need for public filing of documents relating to the arrested defendants against the need to maintain the names of the fugitives under seal, that this Court enter an Order to:

1. Unseal the case.
2. Make public the name of NESTOR JAVIER PADILLA, Defendant #3, GLADYS YOLANDA MARTINEZ, Defendant #4 and YESICA ALVAREZ-CASTILLO, Defendant #6.
3. File in the Court Docket the attached redacted indictments, which reveal the names of the defendants who may be made public and redacts the names of those who remain fugitives. (Attachment A.)
4. Maintain the names of any redacted defendants under seal by referring them as "REDACTED DEFENDANT" in the public record.

1           5.     Authorize the Clerk, after the arrest of a redacted defendant, to publicly  
2 docket pleadings using the defendant's actual name. The government will, as soon as  
3 practicable after the arrest of a redacted defendant, move to unseal that defendant's name  
4 and move to unseal the original indictment or file a redacted indictment revealing the  
5 defendant's name.

6           6.     It is the intent of the undersigned counsel to unseal the entire case with the  
7 exception of the redacted defendants referred to above, and the following specific  
8 documents: the Unredacted Indictment [Doc. 3], the Motion to Seal Indictment [Doc. 1],  
9 the Order to Seal Indictment [Doc. 2].

10          7.     Pursuant to the March 2004 Judicial Conference guidance, certain criminal  
11 documents shall not be included in the public case file and should not be made available to  
12 the public at the courthouse or via remote electronic access: unexecuted summonses or  
13 warrants of any kind (e.g., search warrants, arrest warrants); pretrial bail or presentence  
14 investigation reports; statements of reasons in the judgment of conviction; juvenile records;  
15 documents containing identifying information about jurors or potential jurors; financial  
16 affidavits filed in seeking representation pursuant to the Criminal Justice Act; *ex parte*  
17 requests for authorization of investigative; and expert or other services pursuant to the  
18 Criminal Justice Act. Accordingly, the government requests that documents in those  
19 categories remain sealed without further order of the Court.

20          8.     The government further requests authorization to disclose the name(s) of any  
21 redacted defendant(s), and any indictments that disclose these names, as necessary for law  
22 enforcement purposes, to further the prosecution of the case, and when filing any motion(s)  
23 to make public the names of redacted defendant(s).

24               Respectfully submitted this 4<sup>th</sup> day of September, 2018.

25                               ELIZABETH A. STRANGE  
26                               First Assistant United States Attorney  
27                               District of Arizona

28                                 
                                  CHRISTINA M. VEJAR  
                                  Assistant U.S. Attorney